

# EXHIBIT D

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

*Abel, et al. v. Islamic Republic of Iran (1:18-CV-11837) (GBD) (SN)*

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, Maria Zayas, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Maria Zayas, and I am the sister of Ana M. Centeno, who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that Julio Masa Lebron was the functional equivalent of Ana M. Centeno's father.

2. While Julio Masa Lebron is not Ana M. Centeno's biological father, for the reasons set forth below, Julio Masa Lebron should be deemed the functional equivalent.

3. In 1968, Julio Masa Lebron met my sister Ana M. Centeno, who we affectionately called "Mel," when he started dating our mother and his wife of over fifty years, Antonia Torres Ayala. Mel was only 6 years old at the time.<sup>1</sup>

4. A year later in 1969, we all moved in together as a family along with our other siblings and lived in Jersey City, New Jersey.

5. I've always considered Julio Masa Lebron, my stepdad, our father and my stepdad has always considered Mel his child, along with myself and our other siblings. Mel and

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<sup>1</sup> My mother and stepdad have been together for over fifty years and were legally married on May 5, 1990.

I and our other siblings are his children in every way, especially because our biological father, who lived in Puerto Rico, was not in our lives, did not financially support us, and passed away when Mel was 15 years old and I was 13 years old.

6. While my mom worked occasionally, my stepdad was the main provider and the primary financial supporter in our family. My stepdad maintained Mel along with myself and our other siblings and also filed income tax returns with Mel, myself and our other siblings as dependents.

7. In addition to this financial support, my stepdad treated Mel and myself like his daughters, emotionally and socially. My stepdad would give us advice (and, of course, discipline) like any loving father and as to the outside world, there was no question that Mel and I and our siblings, were his children.

8. He taught Mel and I how to ride a bike and drive a car. He enjoyed taking us to the park and our family camping trips as well as to the arcade in Long Branch, New Jersey. When Mel was older, her relationship with our stepdad as father and daughter remained.

9. Mel lived with my stepdad until she became a young adult and moved out around 1984 when she was in her early 20s.

10. Even though she no longer lived at our family home, she moved close by in New Jersey and she would visit my mother and my stepdad often.

11. In 1998, our mother and my stepdad moved to Puerto Rico where Mel continued to visit them often. She also started to financially help my mother and my stepdad when we needed it, such as when they were buying their house in Puerto Rico.

12. On September 11, 2001, Mel was taken from our family.

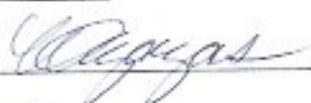
13. We held on hoping Mel had escaped. Unfortunately, after a few days, and knowing that her car was still in the same parking space she had left it, we had to accept the fact that Mel was one of the victims and shortly thereafter held a funeral in her name. It was a difficult loss for our entire family including my stepdad and we treasure her memories.

14. In sum, Ana M. Centeno's, my sister, was very much Julio Masa Lebron's daughter and they considered each-other to be father and daughter in every way.

15. My stepdad was in her life since she was a small child, lived with her entire childhood, supported her financial and emotionally as a father, and will miss her always as a father who lost his daughter. *See* Exhibit 1.

*[intentionally left blank]*

Executed on: 8/14/19

Name (Signature): 

Name (Print): Maria A. Zagas

# EXHIBIT 1



Julio took the picture.











